

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

(1) LESLIE BRIGGS, as next friend of T.W. )  
and B.S; )  
(2) EVAN WATSON, as next friend of C.R.; )  
and )  
(3) HENRY A. MEYER, III, as next friend )  
of A.M., for themselves and for others )  
similarly situated, )

Plaintiffs, )

v. )

Case No: 23-cv-81-GKF-JFJ

(1) CARRIE SLATTON-HODGES, in her )  
official capacity as the Commissioner of the )  
Oklahoma Department of Mental Health )  
and Substance Abuse Services; and )  
(2) CRYSTAL HERNANDEZ, in her official )  
capacity as Executive Director of the )  
Oklahoma Forensic Center, )

Defendants. )

**JOINT MOTION TO EXTEND STAY**

Plaintiffs and Defendants jointly request that the stay entered on March 7, 2024 [Doc. 38] be extended an additional twenty-one (21) days so the parties may continue settlement negotiations. The stay is scheduled to expire on April 22, 2024. The negotiations have been positive and productive in this matter and the Parties, have concluded the fact-finding phase of their settlement discussions and are actively working together to reach a settlement agreement. As such, Plaintiffs and Defendants would like this additional time to continue in this manner to seek an amicable resolution in this matter.

The Parties are now actively working to form a settlement plan which they intend to provide this Court at the conclusion of the requested stay. Given the complexity of the issues involved; the parties respectfully request the Court stay all proceedings for an additional twenty-one (21) days. At the expiration of the stay, the parties propose the Court set a status conference to discuss next steps.

The parties would not request an additional stay unless they believed there was a reasonable probability of achieving a negotiated resolution. A stay, therefore, will likely conserve judicial resources. The power to stay a case “is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254-55 (1936) (citing *Kansas City S. Ry. Co. v. United States*, 282 U.S. 760, 763 (1931)). Accordingly, whether to stay a matter is left to the sound discretion of the trial court. *Wang v. Hsu*, 919 F.2d 130, 130 (10th Cir. 1990).

WHEREFORE, the parties jointly request the Court stay all proceedings in this matter for an additional twenty-one (21) days to allow the parties to continue to engage in good-faith settlement discussions. The parties intend to submit to the Court a settlement plan to resolve this matter at the conclusion of the requested stay.  
[Signature lines on following page.]

RESPECTFULLY SUBMITTED,

/s/ Paul DeMuro

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